

WI Billing Docket Issues Directory  
6720-TI-183

Issue	Name	Description	Issue Group
MCI-1	Identification Of Business Rules Associated With USOCs/Rates	Require SBC to identify the Business Rules associated with each USOC and rate billed in Wisconsin	SBC Practices / Business Rules
MCI-2	Identification Of Support For Business Rules Associated With USOCs/Rates	Require SBC to identify the cost studies, Commission orders, arbitration awards, etc. that support SBC 's Business Rules	SBC Practices / Business Rules
MCI-3	Identification Of USOCs Applicable To SBC 's Tariffed Rates	Require SBC to include USOCs in its Wisconsin tariffs for every tariffed wholesale rate and standardize the descriptions of products and services found in interconnection agreements and tariffs	USOCs SBC Practices / Business Rules
MCI-4	SBC Billing Accuracy Plan	Require SBC to develop and implement a Billing Accuracy Plan that includes a component addressing the timely updating and accurate maintenance of its rate tables	Rate Table Verification
MCI-5	Confirmation Of Summary Format For SBC Dispute Resolution	Confirm that MCI can raise systemic billing disputes without submitting detailed lists of all affected TNs	Dispute Resolution Procedures
MCI-6	Improve Consistency Of SBC 's Billing Dispute Resolution Processes	Requiring SBC to improve the consistency of its processes for handling and coding wholesale billing disputes and dispute resolution credits	Dispute Resolution Procedures
MCI-7	Billing CLECs For Lines Not Theirs	SBC has continued to bill CLECs for lines that do not belong to the CLECs being billed, or at least for which SBC has transmitted line loss notifications to CLECs	Rate Issue: Billing for disconnected services
MCI-8	CABS Reconciliation	Although SBC has conceded that it overbilled CLECs as a result of errors ostensibly caused by its	Misc.

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		migration to CABS billing in October 2002, the amount at issue still remains in dispute as to lines for which SBC used a proxy to determine the original installation date	
MCI-9	Erroneous NRCs	SBC has not responded adequately to CLECs' questions regarding non-recurring charges ("NRCs") and usage charges appearing erroneously on CLECs' UNE-P bills	Rate Issue: Rates not consistent with ICA
MCI-10	Manual Errors	SBC should present a proposal to rectify the billing problems that it has repeatedly blamed on manual error	Billing Process: Errors
MCI-11	6720-TI-161 True-Up	The Commission should not close the issues list for this proceeding until the true-up process for Docket No. 6720-TI-161 is substantially underway, since it is likely to raise presently unknown billing problems.	Misc.
AT&T-1	"AT&T Global Issue #1"	SBC continues to generate inaccurate wholesale bills. SBC continues to mis-bill CLECs and otherwise bill CLECs for lines they do not have.	Billing Process: Errors
AT&T-2	Notice and Verification of Billing Adjustments	SBC fails to provide sufficient notice of significant billing adjustments. SBC provides these adjustments (credits or debits) absent any explanation or advanced notice.	Need for Audit / Support Information
AT&T - 3	Billing Dispute Resolution	SBC is attempting to require AT&T to undertake processes beyond the processes described in AT&T's ICAs.	Dispute Resolution Procedures
AT&T-4	CABS Reconciliation	SBC's reconciliation after its CABS conversion is fraught with errors and based on a flawed methodology. SBC has not correctly calculated the debits and credits associated with its incorrect wholesale bills, is still disclosing information about the reconciliation on a piecemeal basis, and has not attempted to address any	Misc.

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		of the criticisms that CLECs have raised regarding the reconciliation.	
AT&T – 5	PM 17 Restatement	SBC inappropriately refuses to restate PM 17 (the billing completeness timeliness measure) to reflect the late postings to CABS of orders affected by the CABS reconciliation.	Misc.
AT&T-6	July 2003 Adjustments	In the last several weeks, SBC has identified a number of additional adjustments to AT&T's bills as a result of further billing inaccuracies. SBC has not provided root cause information or disclosed its methodology for determining the credits/debits resulting from these latest errors (which uncovered such errors as loop misclassification errors), leaving AT&T with no ability to determine whether SBC's corrections were accurate.	Need for Audit / Support Information
COVAD-1	Detailed billing information	SBC Wisconsin should be required to provide its CLEC customers with detailed billing information sufficient to verify SBC's bills. A simple model wherein BANs are detailed by dated invoice would be sufficient and would allow the CLEC to understand how SBC has applied past due amounts. Without this information, the customer has great difficulty validating the SBC bills and it is difficult to determine how SBC has applied previous payments.	Need for Audit / Support Information
COVAD-2	Time to Render Bill	SBC should be required to render monthly bills to its CLEC customers no later than 30 Calendar days after the month in which service is provided. Anything longer impacts the CLEC's financials and its ability to control expenses. The customer should not be required to pay untimely bills.	Billing Process: Timeliness
COVAD-3	Billing Disputes	In the event of a billing dispute between SBC Wisconsin and a	Rate Issue: Late Payment /

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		CLEC customer, neither party should be required to escrow the amount of any part of the disputed amount, nor should either party be authorized to terminate the parties' agreement for the failure to pay disputed amounts within the time frame specified for dispute resolution. The CLEC customer should not have to either pay the disputed amount upfront or put the same in escrow until the dispute is settled, as either scenario greatly impacts the CLEC's available cash on hand.	Interest / Escrow
COVAD-4	Billing Remittance	The CLEC customer should be given a commercially reasonable deadline for remitting payment for SBC's bills, that is, remittance should be due within 30 days from the receipt by the CLEC of a detailed and accurate bill – whether in electronic or manual form - allowing the CLEC sufficient time to validate the bill.	Billing Process: Timeliness
COVAD-5	Interest / Late Payment Charges	Both late payments and credited amounts should be subject to a commercially reasonable penalty, that is, interest on past amounts at the prime rate plus 1% annualized, determined on a yearly basis, to be set on January 1 of each calendar year. Reciprocal interest rates are only fair.	Rate Issue: Late Payment / Interest / Escrow
NTD-1	Application of Granted Credits	SBC will grant claims and it will take over 90 days to appear on NTD's invoices.	Billing Process: Timeliness
NTD-2	Changing of PONs	NTD submits an order with a PON (Purchase Order Number). SBC changes these PONs in numerous ways. One example of such a change is identifying PONs as CABSDAILY. The changes in PONs make it impossible to track and verify orders. All PONs are	Need for Audit / Support Information

Issue	Name	Description	Issue Group
		changed on our Facilities invoice.	
NTD-3	Double Billing for Lines	SBC bills the same line twice on the invoice.	Rate Issue: Double Billing
NTD-4	Escalation Process	Disputes that are denied for a reason that NTD considers unjust are escalated. The process calls for these to go to the LCS Billing Manager. These claims have taken months to get responses on. Some escalations are directed to our account manger.	Billing Process: Timeliness  SBC Practices / Business Rules
NTD-5	Incorrect Rates on Contracted Resale Circuits	When ordering a resale circuit, NTD must first submit a contract to SBC's contract department. This includes the circuit description, price and term plan. We are given a contract ID number which must be submitted on our order. SBC is not giving us the rated on our signed contract.	Rate Issue: Rates not consistent with ICA
NTD-6	Installation Charges	SBC is improperly assessing a \$40.10 install charge on lines that are being assumed. These lines should not be subject to an install charges.	Rate Issue: Rates not consistent with ICA
NTD-7	Quantification of Disputes	Disputes that are denied and than re-opened or escalated, are not quantified in the dispute dollars open by NTD.	Dispute Resolution Procedures
NTD-8	Converting Single Orders into Multiple Orders	NTD submits an order to SBC. SBC will break the order up into two or three different orders and charge NTD an order processing charge for each order.	SBC Practices / Business Rules
SBC-1	Facility Disputes	CLECs have incorrectly billed SBC charges associated with interconnection facilities. CLECs have billed SBC for circuits that have been disconnected. CLECs have billed inappropriate rate elements to SBC. Finally, CLECs have billed SBC beyond the 120 day back billing provision provided in the ICA.	Rate Issue: Rates not consistent with ICA
SBC-2	Minutes of Use Disputes	CLECs have billed SBC for local and intralata toll minutes of use that	Rate Issue: Rates not

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		did not originate from SBC end users. The total outstanding dispute is approximately \$12M.	consistent with ICA
SBC-3	Port-Back Charges	CLECs are inappropriately billing SBC for charges associated with SBC's win or win back of end users even though the FCC has stated that cost recovery associated with portability must be competitively neutral. The CLECs have also attempted to circumvent the interconnection agreement by attempting to justify such charges in a tariff. SBC takes the position that a charge from a CLEC to SBC is not competitively neutral, not contained in the ICA and should not be charged to SBC.	Rate Issue: Rates not consistent with ICA
SBC-4	Rate Disputes	CLECs have billed SBC incorrect rates for both local and intraLATA toll usage. The outstanding dispute amounts for local rate disputes is approximately \$.3M and \$.7M for intraLata toll rate disputes.	Rate Issue: Rates not consistent with ICA
TSI	SBC inability to produce "billing detail" or "source data" associated with signaling.	TSI has requested billing detail regarding signaling charges; SBC insists that the tariff does not include any requirement to produce billing detail for audit purposes. Without reliable billing or source data it is impossible for TSI to audit and verify the accuracy of SBC's charges	Need for Audit / Support Information
TDS-1	Fact that Access, Collocation and LEC Services Billing is not considered within the scope of SBCs Performance Measurements.	After months of work already under way, it has recently come to TDS Metrocoms attention that SBC has not been considering Access, Collocation or LEC Services Billing in the scope of performance measurements.	Misc.
TDS-2	Change Management / internal Controls	TDS Metrocom feels that there is lacking internal controls within SBCs Billing OSS as it relates to	SBC Practices / Business Rules

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		change management. For example, we have reason to believe that when there are changes required to their billing OSS due to either interconnection agreement amendments, tariff changes, commission orders, etc, that each of the required changes are not necessarily implemented correctly and/or in a timely manner.	
TDS-3	Circuit to Circuit Reconciliation	Although TDS Metrocom is currently researching this issue, we have reason to believe that SBC is billing us for circuits that we no longer have, and had sent disconnect orders to them.	Rate Issue: Billing for disconnected services
TDS-4	Dispute Claim Acknowledgement/ Resolution Notice Inconsistency	SBC requires TDS Metrocom to complete detailed dispute claim forms, identifying line item disputes, by BAN, by Bill Date, etc. However, TDS Metrocom does not consistently receive either acknowledgement or resolution notices for each of our claims. We experience a variety of scenarios including: 1. Seeing adjustments on our invoices relating to claims, however we never received either an acknowledgement or a resolution notification. 2. We receive dispute claim resolutions for claims we submitted, however are not able to validate that the adjustment communicated with that resolution appeared on our invoice. 3. We receive dispute claim resolution notices for adjustments that we never submitted a claim for. 4. SBC does not consistently send acknowledgement or resolution notices to the same person that submitted the claim.	Dispute Resolution Procedures
TDS-5	Dispute Claim	TDS Metrocom has been	Dispute

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	Processing Timeliness	experiencing serious delays in the acknowledging as well as the resolution of billing claims.	Resolution Procedures
TDS-6	Calling Name Delivery Service	Charges are assessed to TDS Metrocom for the look up of calling name and number delivery. Charges are assessed at a switch/point code level. In November 2002, we received a large back bill from SBC for this activity. Issues we discovered with this invoice include, but not limited to; <ol style="list-style-type: none"> <li>1. Invoice contained 16 months worth of back billing.</li> <li>2. SBC was billing us at inaccurate rates.</li> </ol>	Rate Issue: Backbilling and Rates not consistent with ICA
TDS-7	Collocation Power	In May 2003, TDS Metrocom discovered that SBC was inappropriately billing us for collocation power. Specifically, SBC is not billing power based on usage as stated in our ICA. They are also charging us for redundant power.	Rate Issue: Rates not consistent with ICA
TDS-8	Loop Conditioning Rates	While TDS Metrocom disputes the assessing of conditioning charges in general, we have identified that SBC is charging incorrect rates for conditioning activity.	Rate Issue: Rates not consistent with ICA
TDS-9	Credit Adjustment by Billing Account Number (BAN) process.	Although SBC requires TDS Metrocom to complete detailed dispute claim forms, identifying line item disputes, by BAN, by Bill Date, etc, etc, SBC in some cases, requests TDS Metrocom to allow SBC to place a lump sum credit adjustment on a single BAN as opposed to making the appropriate adjustments on the respective BANs that they assessed the charges originally. This issue causes unnecessary time consuming administrative accounting work for TDS Metrocom. If SBC's billing was accurate in the first place, this would	SBC Practices / Business Rules



Issue	Name	Description	Issue Group
		not be an issue.	
TDS-10	Double Billing of Circuits	In May 2002, TDS Metrocom discovered that SBC was inappropriately billing us for a circuit on two different invoices	Rate Issue: Double Billing
TDS-11	Design CO Construction, Customer Connection, Admin charges.	In January 2003, TDS Metrocom discovered that SBC was inappropriately billing us for Design CO Construction, Customer Connection, Administrative type charges contrary to agreements between our two companies.	Rate Issue: Rates not consistent with ICA
TDS-12	Direct End Office Trunks (DEOTs)	In April 2003, TDS Metrocom discovered that SBC was inappropriately billing us for direct end office trunks contrary to our ICA.	Rate Issue: Rates not consistent with ICA
TDS-13	Disconnected Circuits	In March 2003, TDS Metrocom discovered that SBC was inappropriately billing us for circuits we had previously sent disconnect orders on. These disconnect orders were from as far back as June 2002.	Rate Issue: Billing for Disconnected Circuits
TDS-14	Non existent documentation for adjustments.	In addition to the numerous surprise back billing by SBC to date, TDS Metrocom has been made aware that they will be making several hundred thousand dollars worth of adjustments made to our future invoices. The only supporting information we have regarding an explanation for these charges are a result of a phone conversation with our Account Manager. Even then, only a fraction of the supporting explanation for these adjustments was made available to us, of which were only provided verbally. To date, SBC has yet to honor our request for written documentation explaining these adjustments. However, on the other hand, when TDS Metrocom is required to dispute a charge on our invoice, we are required to provide the	Need for Audit / Support Information

Issue	Name	Description	Issue Group
		<p>following supporting facts related to the dispute or the dispute claim will be rejected as incomplete:</p> <ul style="list-style-type: none"> <li>• Account Identifier</li> <li>• Bill Date</li> <li>• Circuit ID</li> <li>• Claim Amount</li> <li>• Customer Comments</li> <li>• USOC</li> </ul>	
TDS-15	Early Termination Liability	On our January 13, 2003 invoice, SBC Assessed an early termination penalty for disconnecting a circuit a day early. The contract end date was on a Saturday and due to that, we requested a disconnect for that Friday.	Rate Issue
TDS-16	Joint SONET circuit billing	In April 2002, TDS Metrocom discovered that SBC was inappropriately billing us for joint SONET facilities contrary to our ICA.	Rate Issue: Rates not consistent with ICA
TDS-17	Late Payment Charges / Interest	TDS Metrocom is expected by SBC to pay 100% of all charges billed by SBC by the due date on the invoice. Then, if we dispute any of the charges, we should dispute them after the fact. Combine this process with the lacking timeliness of SBC's billing dispute process, we are required to bear the financial risk. Additionally, when SBC does finally acknowledge the validity of a dispute claim of ours, they do not compensate us with interest on those funds. Due to this financial risk, that has no set duration, TDS Metrocom finds ourselves withholding payment for charges that we dispute. This causes LPCs to get assessed to our accounts. LPCs that we have to dispute on the back end once the dispute is resolved.	Rate Issue: Late Payment / Interest
TDS-18	Missing Residential /	There are separate code identifiers, MUJSE for Residential and MUJCE	Need for Audit Information

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	Business Identifier	for Business, that SBC places on their bill to identify which circuits are entered into their system as Residential versus Business. TDS Metrocom has discovered recently that SBC is failing to consistently provide such identifier, preventing TDS Metrocom from validating SBCs invoice.	
TDS-19	Multiple Monthly Recurring Charges (MRC) as a single Non-Recurring Charge (NRC).	In October 2002, TDS Metrocom discovered that SBC was placing on our non recurring charges section of our invoice, a single charge that consisted of multiple months worth of monthly recurring charges (MRC). In some cases, there were up to 37 months worth of MRCs listed as a single NRC charge. Issues due to this issue include, but not limited to; 1. SBC back billing more than 3 years worth of activity.. 2. Unnecessary validation efforts by us.	Rate Issue: Backbilling
TDS-20	Dispute Single Adjustments Vs Multiple Adjustments	SBC requires TDS Metrocom to complete detailed dispute claim forms, identifying line item disputes, by BAN, by Bill Date, etc. However, TDS Metrocom has experienced situations when SBC acknowledges adjustments that need to be made to our account, they request that we allow them to place a lump sum credit on a single BAN as opposed to making the adjustments to the individual BANs that the charges were applied to. This creates unnecessary resource time on our part to make accounting adjustments on our side to account for this.	Need for Audit Information
TDS-21	Ohio Collocation Disconnections	In February 2003, TDS Metrocom discovered that SBC was inappropriately billing us for collocation products we had	Rate Issue: Billing for disconnected services

Issue	Name	Description	Issue Group
		previously sent disconnect orders on. These disconnect orders were from as far back as December 2002.	
TDS-22	Outstanding Late Payment Charges	In December 2001, TDS Metrocom discovered that SBC was inappropriately billing us for late payment charges associated with charges that had previously been adjusted.	Rate Issue: Billing for disconnected services
TDS-23	Proactive Prevention	Due to the numerous issues discovered within SBCs Billing OSS to date, TDS Metrocom has been attempting to avoid disputes in the future. Specifically, we have been attempting, since April 2003, to obtain written confirmation from SBC, pricing of a limited set of DS-3 products prior to ordering them. To date, we have yet to receive written confirmation from SBC exactly what the pricing would be.	Need for Support Information
TDS-24	Resale Termination Liability	In February 1999, TDS Metrocom discovered that SBC charged us for an end users termination liability.	Rate Issue:
TDS-25	Residential / Business Misclassification	In October 2002, TDS Metrocom discovered that SBC was taking residential orders and coding them as business in their systems. Not until roughly 7 months after we brought this to SBCs attention did they finally started making adjustments to our invoices and sent out Accessible Letter CLECAM03-197 to alert other affected carriers. Issues due to this misclassification include, but not limited to; 1. Data integrity issues within SBCs records. 2. SBC was billing us at inaccurate rates.	SBC Practices / Business Rules  Rate Issue: Rates not consistent with ICA
TDS-26	Trouble Isolation Charge (TIC)	TDS Metrocom is not consistently getting the residential discount monthly recurring charge (MRC) on all residential circuits.	Rate Issue: Rates not consistent with ICA
TDS-27	Inclusion of	TDS Metrocom believes that the	Misc.

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	Billing Subteam Forum Issues	issues completed to date, under investigation and future issues need to be incorporated into this Docket proceeding.	
TDS-28	Reactive efforts by TDS as opposed to proactive efforts by SBC.	<p>TDS Metrocom has spent countless resources making improvements to SBCs Billing OSS as opposed to SBC, as the vendor, proactively providing adequate service. Examples include:</p> <ol style="list-style-type: none"> <li>1. TDS Metrocom auditing and identifying exceptions to SBCs invoices (incorrect rates, double billing, etc).</li> <li>2. Managing and escalating the progress of dispute claims submitted.</li> <li>3. Identifying gaps in current performance measurements related to billing.</li> <li>4. Identifying areas for improvements in billing dispute claim process.</li> </ol>	Misc.
TDS-29	Trouble Isolation Charges (TIC) {second TIC issue}	<p>“TIC” type charges are charges assessed by SBC to CLECs when SBC field technicians code trouble tickets indicating that they were not able to isolate the trouble to SBCs side of the network. These type of charges generally are assessed using three different USOCs that we are aware of; VRP, MVV and ALK. MVV and ALK are time and material type charges and VRP is a trouble isolation type charge. TDS Metrocom has identified several issues as it relates to SBCs billing of “TIC” type of activity including, but not limited to:</p> <ul style="list-style-type: none"> <li>• Incorrect rates</li> <li>• Inappropriate charges (i.e. charged when we should not have been)</li> <li>• Double billing</li> <li>• Incomplete billing</li> </ul>	<p>SBC Practices / Business Rules</p> <p>Rate Issues: Rates not consistent with ICA, Backbilling, Double Billing</p>

<b>Issue</b>	<b>Name</b>	<b>Description</b>	<b>Issue Group</b>
TDS-30	Toll Free Database Query	Charges are assessed to TDS Metrocom for the look up of terminating telephone numbers associated with toll free numbers. Charges are assessed at a switch/point code level. In October 2002, we received the first invoice from SBC for this activity. Issues we discovered with this invoice include, but not limited to; 1. Invoice contained 12 months worth of back billing. 2. SBC was billing us for activity that did not belong to us. Of the 19 point codes that SBC was billing us for, only 8 of them were actually ours. The other 9 belonged to other companies, yet SBC was billing us for them.	Rate Issues: Backbilling, Rates not consistent with ICA
TDS-31	Transit Rates	In June 2003, TDS Metrocom identified that SBC was charging incorrect rates related to Transit activity.	Rate Issue: Rates not consistent with ICA
TDS-32	Unexplained Charges	In July 2003, TDS Metrocom identified charges that do not have explanations as to what they are for other than a description of "Customer Audit Number 2002".	Need for Audit / Support Information
TDS-33	USOC Changes	In November 2002, TDS Metrocom identified that certain USOCs associated with collocation rate elements are no longer showing up on our invoice, yet similar elements under different USOCs started to appear, with different rates. It appears that SBC is renaming a rate element under a different USOC and charging a different rate.	Need for Audit / Support Information
TDS-34	Volume Validation	While TDS Metrocom has already identified exceptions to SBC's billing in terms of rates charged, we continue to research the validation of the volume activity that SBC has been billing us.	SBC Practices / Business Rules